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February 26, 2004

BY FEDERAL EXPRESS

The Honorable Richard Conway Casey
United States District Judge
Southern District of New York
United States Court House
500 Pearl Street
Room 1350
New York, NY 10007-1312

Re: In re Terrorist Attacks on September 11, 2001 (MDL 1570)

Dear Judge Casey:

This Firm represents Prince Naif bin Abdulaziz al Saud, the Minister of Interior for the Kingdom of Saudi Arabia and a member of the Saudi Council of Ministers. He has been named as a defendant in four of the actions that have been consolidated before Your Honor, as well as the Federal Insurance Case.^{1/}

To date, Prince Naif has only been served in the Federal Insurance case. We have entered into a stipulation in that case to permit the plaintiffs to amend their complaint and to put off the time for Prince Naif to respond until after the amended complaint has been filed. It is our intention to contact counsel for the plaintiffs in the four other cases and arrange for service to be accomplished.

Based on what we have seen of the complaints in all of these cases, the allegations are virtually identical. We anticipate that the amended allegations in the Federal Insurance case will be similar. As such, we submit that it would be most efficient for the Court and the parties for Prince Naif to respond to all of the complaints in one motion. Therefore, we request that the Court permit us to

^{1/} Prince Naif is named as a defendant in Burnett, et al. v. Al Baraka Investment & Development Corp., et al., District of Columbia C.A. No. 1:02-1616; Ashton, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:02-6977; Salvo, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:03-5071; York, et al. v. Al Qaeda Islamic Army, et al., Southern District of New York C.A. No. 1:03-5493; as well as Federal Insurance Co., et al. v. Al Qaida, et al., Southern District of New York C.A. No. 1:03-6978.

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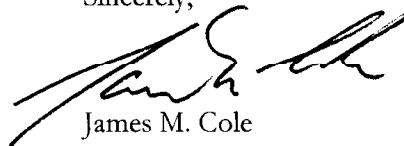
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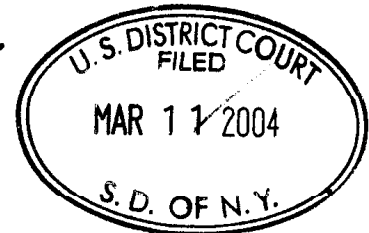
application granted } consolidate the response to the five complaints into one brief.^{2/} Similarly, we propose that the plaintiffs' oppositions to that motion be combined into one consolidated brief, as the issues to which they will respond will be identical.

application denied } Finally, we propose that the briefing schedule for Prince Naif be put off until the Court has resolved the motions to be filed by Prince Sultan and Prince Turki. Based on the correspondence that was sent to Your Honor by counsel for Prince Sultan and Prince Turki, they plan to file their motions by March 5, 2004. Prince Naif's motion to dismiss will be based on many of the same grounds that are being asserted by Prince Sultan and Prince Turki. In particular, we will raise the Foreign Sovereign Immunity defense that has already been ruled on by Judge Robertson in the District of Columbia. Having the benefit of the Court's rulings on these issues would streamline our brief and expedite the motion process as to Prince Naif. Since we are, in any event, awaiting the amendment of the Federal Insurance complaint, and service has not yet been accomplished in the other cases, we submit that it would be prudent to allow the other motions on issues that will apply to Prince Naif to be resolved before we file our motion to dismiss.

We appreciate the Court's consideration of these matters. We wanted to raise them prior to the status hearing on March 1, 2004, so that the Court would have an opportunity to consider the proposals and ask any questions it may have about them at the hearing. We look forward to appearing before Your Honor on March 1, 2004.

Sincerely,


James M. Cole



cc: See Attached Service List (by facsimile or email)

Prince Naif shall file his motion to dismiss on March 19, 2004, along with the other defendants in this case.

^{2/} Because of the number of issues involved in these cases, we may ask the Court for an extension of the page limit to allow briefing of each of the issues raised by the complaints.

Richard Conway Casey 3/9/04

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